

### Remarks

Claims 1-24 are pending. Claims 1-4, 7-10, 13-16, and 19-22 stand rejected under 35 U.S.C. 103(a) as being obvious from Khan in view of Strakovsky and Bandeira. Claims 5-6, 11-12, 17-18, and 23-24 stand rejected as obvious from Khan in view of Strakovsky, Bandeira and Haartsen.

Claim 1 is directed to a radio transmission power control circuit which in part requires a receiver baseband circuit and a feedback control circuit, each of which have specifically defined characteristics that are not taught or suggested by the prior art.

First, the receiver baseband circuit of claim 1 must be part of a half-duplex radio transceiver that alternately transmits and receives radio signals, which operates (1) when receiving to process received radio signals, and also (2) when transmitting to process the downconverter output to produce a power signal representative of the transmitted signal. Such a receiver baseband circuit is not taught or suggested by the prior art.

As noted by the latest Office Action, the closest prior art would appear to be Bandeira, whose Fig. 6 seems to show a half-duplex radio transceiver having an RF MAC Module 632 which when receiving gets a baseband input of a received radio signal. But, when transmitting, the RF MAC Module 632 in Bandeira does not satisfy criteria (2) above. Bandeira's Module 632 does not process a downconverter output (which for claim 1 must be created "having a frequency equal to the frequency difference between a first downconverter input based on a transmitted signal of a radio transmitter and a second downconverter input based on a local oscillator signal") to produce a power signal representative of the transmitted signal. Rather, when transmitting, Bandeira's Module 632 instead provides the received baseband signal to a

modulator 618 to modulate the carrier signal. *See para. [0079]*. This operation of Bandeira is not equivalent to the operation required of the receiver baseband circuit required by claim 1.

The recent Office Action also states that the receiver baseband circuit of claim 1 is present in Khan's Fig. 1 and described therein at col. 2, lines 35-67. Applicants strongly disagree. Khan describes only a transmitter not a transceiver. Thus, Khan contains no receiver circuitry at all, much less a receiver baseband circuit as required by claim 1 which operates when receiving to process a baseband input of a received radio signal. The sampling circuit of Khan develops a small sample of the transmitted signal, which is not at all the same as processing a received radio signal, and Khan's feedback sampling circuit for controlling his transmitter is not equivalent to the receiver circuitry in a transceiver which processes a received radio signal.

The foregoing is enough to distinguish claim 1 from the prior art and issue an allowance. But in addition, claim 1 also requires a feedback control circuit that produces a transmitter gain control signal to control transmitted signal power so as to minimize the difference between the power signal and a power reference signal. Thus, the feedback control circuit is not just any generic feedback circuit, but one which processes a very special kind of power signal produced as required by the preceding language of claim 1. That is the power signal in the feedback control circuit must be "representative of the transmitted signal" by processing of the downconverter output by a receiver baseband circuit as discussed above, and the downconverter output itself must have originally been produced as "a frequency equal to the frequency difference between a first downconverter input based on a transmitted signal of a radio transmitter and a second downconverter input based on a local oscillator signal."

Such a feedback control circuit which processes a power signal of the type required is also not taught or suggested by the prior art. The level controller 18 in Strakovsky is no more than a generic feedback circuit which simply compares a transmit power signal to a reference signal. There is no suggestion in Strakovsky (or any of the other references) of a feedback circuit of the type required by claim 1 which compares the specific kind of power signal produced as discussed above.

Moreover, each of the systems and circuits in each of the references—Khan, Strakovsky, and Bandeira—seem to be well adapted for its use just as described. There is no conceivable circumstance under which one of ordinary skill in the art would undertake to modify specific aspects of specific portions of each reference in just the right way so that just the right amount of each could somehow hypothetically be blended together in just the right way so as to distantly resemble the circuit required by claim 1. And any such thought experiment would certainly alter the fundamental operation of each circuit in manner not permitted by the MPEP §2143.01: “THE PROPOSED MODIFICATION CANNOT CHANGE THE PRINCIPLE OF OPERATION OF A REFERENCE.”

Thus, no combination of Kahn, Strakovsky or Bandeira suggests a radio transmission power control circuit as required by claim 1. Claims 2-6 depend from claim 1 and are allowable for the same reasons. Claims 7-12 are method claims similar in substance to apparatus claims 1-6, and which are allowable for the same reasons. Claim 13 is very like claim 1 in scope with the specific additional requirement that blocks and signals are “quadrature.” Thus Claim 13 is allowable for the same reasons as Claim 1. Claims 14-18 depend from Claim 13 and are allowable for the same reasons. Claims 19-24 are method claims similar in substance to the other

claims and allowable for the same reasons. Reconsideration and allowance of the claims is respectfully requested.

### **Conclusion**

It is submitted that all the pending claims are now in a condition for allowance. Reconsideration of the application and issuance of a notice of allowance are respectfully requested. It is believed that no extension of time is required for this matter, but Applicant hereby petitions for and requests that any extension or other fee required for timely consideration of this application be charged to Deposit Account No. 19-4972. The Examiner is requested to telephone the undersigned if any matters remain outstanding so that they may be resolved expeditiously.

Respectfully submitted,

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